

Michael Kind, Esq.  
Nevada Bar No.: 13903  
KAZEROUNI LAW GROUP, APC  
6069 South Fort Apache Road, Suite 100  
Las Vegas, Nevada 89148  
Phone: (800) 400-6808 x7  
FAX: (800) 520-5523  
mkind@kazlg.com

David H. Krieger, Esq.  
Nevada Bar No.: 9086  
HAINES & KRIEGER, LLC  
8985 S. Eastern Avenue, Suite 350  
Henderson, Nevada 89123  
Phone: (702) 880-5554  
FAX: (702) 385-5518  
dkrieger@hainesandkrieger.com  
*Attorneys for Plaintiff Keith H. Asbell*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Keith H. Asbell,

Plaintiff,

v.

Experian Information Solutions,  
Inc. and Trans Union LLC,

Defendants.

Case No.: 2:17-cv-03122-JCM-PAL

**Stipulation for an extension of time  
for Plaintiff to Respond to Trans  
Union LLC's Motion to Dismiss  
[ECF No. 16]**

**(First Request)**

Plaintiff Keith H. Asbell ("Plaintiff") and Trans Union LLC ("Defendant"), by and through their respective counsel, hereby submit this stipulation for an extension of time—until **April 12, 2018**—for Plaintiff to respond to Defendant's Motion to Dismiss Plaintiff's First Amended Complaint, filed on March 15, 2018, ECF No. 16. Plaintiff's Response is currently due on March 29, 2018.

Plaintiff filed his Complaint on December 27, 2017. ECF No. 1. Defendant filed its motion to dismiss on February 15, 2018. ECF No. 11. On March 1, 2018, Plaintiff filed his First Amended Complaint. ECF No. 15. On March 15, 2018, Defendant filed its pending Motion to Dismiss Plaintiff's Amended Complaint. ECF No. 16. Plaintiff's Response is due on March 29, 2018. *Id.* The Parties are actively discussing resolution of the case and, in good faith and not for the purposes of delay, Plaintiff has requested and Defendant has agreed to allow Plaintiff an additional 14 days to respond to the Motion. The Parties in good faith stipulate to allow additional time for Plaintiff to respond to the Motion. This is the first request for an extension of this deadline.

The Parties therefore stipulate that Plaintiff's response to Defendant's motion to dismiss, ECF. No. 16, shall be due on or before **April 12, 2018**.

DATED this 29th day of March 2018.

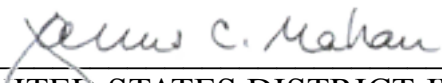
**KAZEROUNI LAW GROUP, APC**

By: /s/ Michael Kind  
Michael Kind, Esq.  
6069 South Fort Apache Road, Suite 100  
Las Vegas, Nevada 89148  
*Attorneys for Plaintiff*

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

By: /s/ Jason Revzin  
Jason Revzin, Esq.  
6385 S. Rainbow Blvd., Suite 600  
Las Vegas, NV 89118  
*Attorneys for Defendant Trans Union LLC*

IT IS SO ORDERED:

  
UNITED STATES DISTRICT JUDGE

March 29, 2018  
DATED: \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on March 29, 2018, the foregoing Stipulation was served via CM/ECF to all parties appearing in this case.

**KAZEROUNI LAW GROUP, APC**

By: /s/ Michael Kind  
Michael Kind  
6069 South Fort Apache Road, Suite 100  
Las Vegas, Nevada 89148

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Las Vegas, Nevada 89148